

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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**Plaintiff:**

Saqib Kafeel  
House No. A800 Sector 11-A North Karachi,  
Karachi, Pakistan, 75850  
Email: [Saqib.kafeel23@gmail.com](mailto:Saqib.kafeel23@gmail.com)

**Defendant:**

CJdropshipping  
Website: <https://www.cjdropshipping.com>  
Email: [legal@cjdropshipping.co](mailto:legal@cjdropshipping.co)

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**Complaint for Damages and Injunctive Relief**

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**Introduction:**

I, Saqib Kafeel, bring this complaint against CJdropshipping due to the severe financial damages and operational harm caused to me as a result of their involvement in intellectual property infringement. This complaint is being filed without an attorney, as I am unable to afford legal representation due to the financial losses I have sustained. I respectfully request that the court grant all the relief sought, including monetary compensation and penalties.

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**Background on CJdropshipping:**

CJdropshipping is an international platform that allows sellers to connect their online stores on platforms such as Amazon, eBay, and Shopify. Sellers can directly list products from CJdropshipping's catalog, which the platform manages by cloning product details, including descriptions and images. CJdropshipping fulfills all orders placed through its platform, handling payments and shipments on behalf of the sellers.

In **case No. 1:24-cv-01548**, filed on behalf of over 200 defendants, CJdropshipping supplied the infringing product, **SPU: CJYD1648529** (Children's Mermaid Swimsuit), which led to the freezing of my eBay, Payoneer, and PayPal accounts. Despite the case being closed on **May 14, 2024**, CJdropshipping failed to take responsibility, resulting in significant financial damage for me and other defendants.

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**My Store in Case No. 1:24-cv-01548:**

My store, **Whimsyverse**, was created on **eBay** and listed the infringing product **SPU: CJYD1648529 (Children's Mermaid Swimsuit)**. I was listed as **Doe No. 217** in the case. Like many other innocent sellers, I unknowingly listed this product directly from CJDropshipping, and I have been severely impacted by the resulting legal action.

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**CJDropshipping's Unresponsiveness:**

I contacted CJDropshipping on **June 28, 2024**, via **support ticket No. T202406281708521641** to address the issue after my accounts were frozen. In response, CJDropshipping quickly deleted the infringing product from their website but has remained unresponsive for the last **four months**, offering no support or resolution to the issue. Their inaction has directly contributed to my financial losses and ongoing difficulties.

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**My Losses Due to CJDropshipping's Negligence:****1. Account Freezes and Financial Losses:**

- My accounts (PayPal, Payoneer, and eBay) have been frozen since **June 20, 2024**, due to my involvement in selling products provided by CJDropshipping. As a direct result, I have suffered financial losses, and I request compensation of **\$10,000 per week** from **June 20, 2024** onwards, until this issue is resolved. This includes missed opportunities to run ad campaigns and payments for services rendered.

**2. Business Impact on Twitter Ads and Monetization:**

- I failed to run critical Twitter ad campaigns for my clients because my cards were declined due to the account freezes, which negatively impacted my business. As a result, my ad campaigns lost their status, and I was also unable to pay for the Twitter Blue subscription, which led to the disabling of monetization on my account.

**3. Crypto and Stock Market Losses:**

- On **June 20, 2024**, there was a major dip in the crypto and stock markets. Due to my frozen accounts, I was unable to add funds to maintain equity in positions I had held for years, which were automatically liquidated, causing significant financial loss.

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**Request for Penalties:**

In addition to the direct compensation for my losses, I request that the court impose a penalty of **\$10 million** against CJdropshipping, reflecting the severe financial damage and emotional distress caused by their negligence in handling intellectual property issues, which led to the freezing of my accounts and the liquidation of my assets.

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**Case No. 1:24-cv-01548:**

This case, closed on **May 14, 2024**, involved over **200 defendants** who lost their life savings due to the sale of the infringing product supplied by CJdropshipping (SPU: CJYD1648529). CJdropshipping's role in this intellectual property infringement constitutes a **criminal offense**, and the company must be held accountable for the financial devastation it has caused to innocent sellers like myself.

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**Request for Court Action:**

1. **Ban CJdropshipping from U.S. E-Commerce Platforms:**

I respectfully request that the court ban CJdropshipping from connecting to any e-commerce platforms such as Amazon, eBay, Shopify, and others, to prevent future harm to innocent sellers through intellectual property disputes, similar to **case No. 1:24-cv-01548**.

2. **Seize CJdropshipping's U.S. Warehouses:**

I ask the court to immediately seize all CJdropshipping warehouses located in the United States to prevent further distribution of infringing products. This includes their warehouses located at:

- **13955 Central Ave, Chino, California, 91710**
- **1471 Jersey Ave, North Brunswick Township, NJ 08902**

3. **Issue a Court Summons to CJdropshipping:**

I request that the court send an official summons to **CJdropshipping** at the following email address: **legal@cjdropshipping.co**. If the defendant fails to provide a preferred mailing address, the summons should be delivered to the public addresses available on their official website, including their U.S. and China offices.

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**Conclusion:**

I, Saqib Kafeel, respectfully request that the court grant the relief outlined above, including compensation for damages, a ban on CJdropshipping from connecting to e-commerce platforms, and the seizure of their U.S. warehouses. CJdropshipping has shown negligence and a lack of accountability, and these actions are necessary to prevent further harm to other innocent sellers.

Thank you for your attention to this matter.

**Sincerely,**

Saqib Kafeel

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Karachi, Pakistan, 75850

Email: saqib.kafeel23@gmail.com

Phone: +923127941099

Dated: 11-Oct-2024

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